

From: [Sontag, John](#)
To: [Ferreira, Steve](#)
Subject: Re: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan
Date: Thursday, July 02, 2020 7:46:35 PM

Steve,

We can do Thursday the 16th from 10-12.

Wednesday doesn't work.

Let me know if that still works for you and I'll send an invite.

Happy Fourth! Stay Safe!

John
John Sontag, Jr. PE
Client Accounts Manager
WESTON SOLUTIONS, INC.
1400 Weston Way
West Chester, PA 19380
610-701-3679 – Direct
484-678-6135 – Cell
610-344-7538 – Fax

From: Ferreira, Steve <Ferreira.Steve@epa.gov>
Sent: Monday, June 29, 2020 7:32:06 AM
To: Sontag, John <John.Sontag@WestonSolutions.com>
Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan
**** External Email ****
10-12 on the 15th and 16th is currently OK

From: Sontag, John <John.Sontag@WestonSolutions.com>
Sent: Friday, June 26, 2020 2:17 PM
To: Ferreira, Steve <Ferreira.Steve@epa.gov>
Cc: Sontag, John <John.Sontag@WestonSolutions.com>
Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan
Steve,

I think we need about 2 hours via webinar. We can do the afternoon of the 15th and the afternoon of the 16th. Please let me know if they both work for you. Lanxess will likely have a representative at the meeting and I'd like to give them a few options.

Thank you and have a great weekend.

John

WESTON SOLUTIONS, INC.
610-701-3679 – Direct
484-678-6135 – Cell

From: Ferreira, Steve [<mailto:Ferreira.Steve@epa.gov>]

Sent: Thursday, June 25, 2020 11:42 AM

To: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

**** External Email ****

How about July 13, 15, 16, and 17th. If you can give me some times I can check them out.

From: Sontag, John <John.Sontag@WestonSolutions.com>

Sent: Wednesday, June 24, 2020 8:55 AM

To: Ferreira, Steve <Ferreira.Steve@epa.gov>

Cc: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

Steve,

Tuesday and Wednesday next week are really bad. Can you look at the following week or two?

Thanks.

John

WESTON SOLUTIONS, INC.

610-701-3679 – Direct

484-678-6135 – Cell

From: Ferreira, Steve [<mailto:Ferreira.Steve@epa.gov>]

Sent: Tuesday, June 23, 2020 6:40 AM

To: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

**** External Email ****

Hi John:

Tuesday June 30 2:00 pm on

Wednesday July 1st 2:00 pm on

Let me know if either of these times works

Thanks,

Steve

From: Sontag, John <John.Sontag@WestonSolutions.com>

Sent: Thursday, June 18, 2020 10:16 AM

To: Ferreira, Steve <Ferreira.Steve@epa.gov>

Cc: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

Steve,

Hope you are doing well.

Have you made any progress on getting the right folks identified and picking some times?

Thank you,

John

WESTON SOLUTIONS, INC.

610-701-3679 – Direct

484-678-6135 – Cell

From: Ferreira, Steve [<mailto:Ferreira.Steve@epa.gov>]

Sent: Monday, June 8, 2020 3:51 PM

To: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

**** External Email ****

Sure John will do.

From: Sontag, John <John.Sontag@WestonSolutions.com>

Sent: Monday, June 08, 2020 3:36 PM

To: Ferreira, Steve <Ferreira.Steve@epa.gov>

Cc: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

Steve,

Can you give me a few days that will work for your team during the week last two weeks of June or the first week of July? The field sampling work will begin this week and is expected to take 3-4 weeks. Once we have that data in house we will begin the detailed design activities and want to talk through the conceptual approach before we start the design.

Thank you,

John

WESTON SOLUTIONS, INC.

610-701-3679 – Direct

484-678-6135 – Cell

From: Ferreira, Steve [<mailto:Ferreira.Steve@epa.gov>]

Sent: Wednesday, May 27, 2020 6:39 AM

To: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

**** External Email ****

Hi John:

No worries, I think next week or perhaps early the following week would work best, as we just found out that Ben Conetta is being promoted and we are sorting out the division of duties going forward after he moves on the end of next week.

Skype should work fine...let me know some dates and I will make sure all the relevant folks are available on my end.

Steve

From: Sontag, John <John.Sontag@WestonSolutions.com>

Sent: Tuesday, May 26, 2020 8:03 AM

To: Ferreira, Steve <Ferreira.Steve@epa.gov>

Cc: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

Steve,

Last week came and went awfully fast and I missed setting up our meeting. Will the end of this week work for you? We have some availability Thursday afternoon and Friday morning. Alternately we could start looking into next week.

I am thinking it will be a webinar for an hour or two at the most. I can set up a Skype for Business or GoTo Meeting webinar, whichever works better for you.

Thanks,

John

WESTON SOLUTIONS, INC.

610-701-3679 – Direct

484-678-6135 – Cell

From: Ferreira, Steve [<mailto:Ferreira.Steve@epa.gov>]

Sent: Thursday, May 7, 2020 6:31 AM

To: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

**** External Email ****

Hi John:

The week of the 18th should work fine, give me some potential times and I will check the availability of our folks.

Steve

From: Sontag, John <John.Sontag@WestonSolutions.com>

Sent: Wednesday, May 06, 2020 2:02 PM

To: Ferreira, Steve <Ferreira.Steve@epa.gov>

Cc: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

Great. Thanks Steve. Once we get the FSP completed, I'd like to set up a meeting (virtual meeting I guess) to discuss the cap and how we are planning on implementing it. How does sometime the week of May 18th look for you?

John

WESTON SOLUTIONS, INC.

610-701-3679 – Direct

484-678-6135 – Cell

From: Ferreira, Steve [<mailto:Ferreira.Steve@epa.gov>]

Sent: Wednesday, May 6, 2020 1:47 PM

To: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

**** External Email ****

We are working on a response now. Hopefully it will be out by the end of this week or early next week at the latest.

From: Sontag, John <John.Sontag@WestonSolutions.com>

Sent: Wednesday, May 06, 2020 10:20 AM

To: Ferreira, Steve <Ferreira.Steve@epa.gov>

Cc: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

Steve,

Can you let me know when you expect to respond to this email?

Thanks,

John

WESTON SOLUTIONS, INC.

610-701-3679 – Direct

484-678-6135 – Cell

From: Sontag, John

Sent: Wednesday, April 29, 2020 3:48 PM

To: Ferreira, Steve <Ferreira.Steve@epa.gov>

Cc: Mark Fisher <MFisher@elminc.com>; M. S. L. P. G. Ramin Ansari (ramin.ansari@lanxess.com) <ramin.ansari@lanxess.com>; Venkat Puranapanda (Venkat.puranapanda@chubb.com) <Venkat.puranapanda@chubb.com>; Devorak, Coleen <Coleen.Devorak@WestonSolutions.com>; Schindler, Jason <Jason.Schindler@WestonSolutions.com>; Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

Steve,

Thank you for the quick review of the FSP. Below please see response to your comments in blue text. If you agree with our responses, we will revise the plan as indicated below and send you the final Field Sampling Plan. We are planning to be in the field in Mid May 2020.

Stay healthy and safe.

John

WESTON SOLUTIONS, INC.

610-701-3679 – Direct

484-678-6135 – Cell

From: Ferreira, Steve [<mailto:Ferreira.Steve@epa.gov>]

Sent: Thursday, April 23, 2020 12:26 PM

To: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

**** External Email ****

Hi John:

Jim Haklar and I have reviewed the site-wide cap sampling plan and we have the following comments/questions:

Comments Pertaining to the Weston Solutions, Inc. (Weston) Document Entitled “Sitewide Cap Field Sampling Plan and Quality Assurance Project Plan Addendum”

Section 1 – Problem Definition and Purpose of this FSP: The text at the top of Page 2 states that an administrative control (Deed Notice) will be applied to address soils with PCB concentrations between 0.49 ppm and 2 ppm. It is our understanding that EPA’s risk-based approval specifies that all areas with PCBs greater than 0.49 ppm (not just between 0.49 ppm and 2 ppm) are to be placed under a deed restriction.

RESPONSE: The Deed Notice will be applied to all locations at the site with PCB concentrations greater than 0.49 mg/kg (ppm). The text will be revised to say, “All soil containing 500 mg/kg or more of PCBs will be removed and disposed offsite. An engineered cap will be designed to cover all soils with PCB concentrations between 2 mg/kg and 500 mg/kg. An administrative control (Deed Notice) will be applied to address all soils with PCB concentrations greater than 0.49 mg/kg, including areas where an engineered cap is installed.”

Section 7 – Soil Sampling Methodology: We note that this Section states that a sample won’t be collected if LNAPL is present. What is the rationale behind this?

RESPONSE: The purpose of the sampling program is to determine the limits of the cap. Based

on the existing Hatco data, soil saturated with LNAPL is presumed to contain PCB concentrations greater than 2 ppm, therefore the cap will have to extend to that area. After the LNAPL is removed from the site under the Interim Remedial Measure, Remedial Action Work Plan (IRM RAWP) (Weston, August 2009) a sampling program will be implemented to verify the concentrations that remain meet the remediation goals.

Also, the first paragraph of this section states that “Outside of wetland areas, the field team will use the most expeditious method.” Is sampling and potentially capping proposed in wetlands areas?

RESPONSE: There are areas onsite where delineation sampling under the FSP will be performed within mapped wetlands and transition areas. The mapped wetland areas are identified in Figure 1 attached to the Draft Field Sampling Plan. Where sample results indicate PCB concentrations exceed 2 mg/kg in a mapped wetland area, the wetland will be remediated by excavation and restoration, not by capping.

Section 8 – Geotechnical Coring: The text states that sampling locations will be navigated to using handheld GPS equipment, but later explains that the location of each core will be field measured to a known point. Will the location of each core also be GPS’d?

RESPONSE: Coordinates for each sampling location will be generated from GIS and a handheld GPS unit will be used to locate these coordinates in the field. If the sample is relocated due to field conditions, the new coordinates will be recorded with a hand held GPS unit. The field measurements described in the FSP will be collected to confirm the handheld GPS locations.

Section 9 – Monitoring Well Installation and Groundwater Sampling: We note that this Section states that wells MW-62 and MW-63, which will be used for LNAPL monitoring, are going to be two inches in diameter, yet MW-64 will be four inches in diameter if LNAPL is observed. What is the reason for this discrepancy?

RESPONSE: Wells MW-62 and MW-63 are located outside of areas of suspected LNAPL and are intended for monitoring purposes only. Monitoring well MW-64 is being installed to assess an area where LNAPL was previously reported during a remedial excavation. If LNAPL is observed at this location, MW-64 will be a 4-inch diameter well, so that it can also be used for LNAPL recovery, if needed.

Given that the wells to be sampled are new and might be prone to turbidity, it has any consideration been given to sampling using low-flow methods?

RESPONSE: The scope of work is intended to comply with NJDEP requirements and guidance documents which state that Low Flow Purging and Sampling (LFPS) is not normally a first round sampling option. The initial sampling will be performed using volume-averaged purging and sampling. LFPS will be proposed, if appropriate, for subsequent sampling rounds.

Section 11 – Decontamination: The text notes the process to be employed to decontaminate equipment that may have contacted PCBs at concentrations greater than 50 ppm (and subject to TSCA) before leaving the site. What decontamination procedures will be used for equipment that may have only

contacted PCBs < 50 ppm?

RESPONSE: All reusable sampling equipment that may have contacted materials with PCBs at concentrations less than 50 ppm will be decontaminated as described in Section 11.1 and 11.2.

Figure 1: We note that the old waste lagoons have been capped, but Figure 1 is showing red dots (PCB exceedances). Also, there appear to be PCB exceedances in the highway/on the grass highway median strip; what does this mean for the project?

RESPONSE: Red dots in the former lagoons represent PCB soil samples with results greater than 2 mg/kg and less than 500 mg/kg collected in 2007 as post-remediation samples. This area is capped and the cap will be detailed in the Final Lagoon Cap Remedial Action Progress Report, which is in preparation. Red dots within Riverside Drive represent delineated soil samples with PCB concentrations greater than 2 mg/kg and less than 50 mg/kg. PCB impacts to this area occurred when this land was formerly Hatco frontage along the 2-lane Industrial Highway. The presence of these results in the Riverside Drive right-of-way means that a Notice for Riverside Drive will be prepared in accordance with NJDEP Deed Notice requirements and copies will be provided to all agencies with governance for the roadway as advised by and in consultation with the NJDEP .

If you have any questions, please let me know.

Steve

From: Sontag, John <John.Sontag@WestonSolutions.com>

Sent: Friday, April 17, 2020 12:05 PM

To: Ferreira, Steve <Ferreira.Steve@epa.gov>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

That would be great Steve. Thanks.

Hope you're doing well and staying healthy.

John

WESTON SOLUTIONS, INC.

610-701-3679 – Direct

484-678-6135 – Cell

From: Ferreira, Steve [<mailto:Ferreira.Steve@epa.gov>]

Sent: Friday, April 17, 2020 11:58 AM

To: Sontag, John <John.Sontag@WestonSolutions.com>

Subject: RE: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

**** External Email ****

Should have something for you by the middle/end of next week if that works.

From: Sontag, John <John.Sontag@WestonSolutions.com>

Sent: Wednesday, April 15, 2020 10:52 AM

To: Ferreira, Steve <Ferreira.Steve@epa.gov>

Cc: Mark D. Fisher (mfisher@elminc.com) <mfisher@elminc.com>; Ansari, Ramin

<Ramin.Ansari@lanxess.com>; Venkat Puranapanda (Venkat.puranapanda@chubb.com)

<Venkat.puranapanda@chubb.com>; Devorak, Coleen <coleen.devorak@westonsolutions.com>;

Schindler, Jason <Jason.Schindler@WestonSolutions.com>; Peachey, Bryan

<Bryan.Peachey@WestonSolutions.com>

Subject: Hatco Site, New Jersey - Site-wide Cap Draft Field Sampling Plan

Steve,

As we discussed at our February 18, 2020 meeting, Weston is preparing to perform a sampling program to support the design of the site-wide cap at the Hatco Site in Fords, New Jersey. The primary objective of the sampling program is to fill in remaining data gaps to define the extent of contaminated soil to be capped at the site. Weston is planning to perform this sampling in the next month.

Please let me know how long you anticipate taking for your review.

Thank you,

John

John Sontag, Jr. PE

Client Services Manager



WESTON SOLUTIONS, INC.

1400 Weston Way

West Chester, PA 19380

610-701-3679 – Direct

484-678-6135 – Cell

610-344-7538 – Fax

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